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7 Attorney for Plaintiff
8 Reverend John Carmichael

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

HEBER JENTZSCH,

Plaintiff,

v.

BENT CORYDON,

Defendant.

JOHN CARMICHAEL,

Plaintiff,

v.

BENT CORYDON,

Defendant.

)
) JUDICIAL COUNCIL
) COORDINATION PROCEEDING
) NO. 2151

)
) LOS ANGELES SUPERIOR
) COURT NO. NVC 14274

)
) RIVERSIDE SUPERIOR
) COURT NO. 189 414

)
)
) RESPONSES OF REVEREND
) JOHN CARMICHAEL TO
) DEFENDANT'S
) INTERROGATORIES
) (FOURTH SET)

Plaintiff John Carmichael responds to defendant Bent
Corydon's "Interrogatories Propounded to John Carmichael (Fourth
Set)," served by mail on December 6, 1988, as follows:

Interrogatory No. 68: IDENTIFY any and all DOCUMENTS in
your possession, or known to YOU to exist and in any way

1 discuss, describe, mention or refer to L. Ron Hubbard's life
2 and biography, including but not limited to the history of his
3 life, his developments of Scientology, his military career, his
4 education, involvement with Black magic, his relationship with
5 any of his past wives other than Mary Sue Hubbard, his
6 relationship with L. Ron Hubbard Jr.

7 Response to No. 68: Plaintiff objects to this
8 interrogatory as it exceeds the limit of 35 specified by
9 California Code of Civil Procedure section 2030(c)(1). There are
10 no circumstances which warrant a greater number under Code of
11 Civil Procedure section 2030(c)(2). Further, plaintiff objects
12 as the interrogatory is vague, ambiguous, unintelligible,
13 overbroad and burdensome. Plaintiff further objects on the
14 grounds that the subject matter of the interrogatory is
15 irrelevant and not calculated to lead to the discovery of
16 admissible evidence. Plaintiff further objects as the
17 interrogatory seeks to invade the rights of freedom of
18 association, religion and privacy under state and federal law.
19 Further, plaintiff is under no obligation to perform research
20 for defendant. Last, defendant's request is taken in bad faith,
21 frivolous and intended solely to harass plaintiff in violation
22 of California Code of Civil Procedure section 128.5.

23 Interrogatory No. 69: IDENTIFY any and all DOCUMENTS in
24 your possession, or known to YOU to exist and in any way
25 discuss, describe, mention or refer to policies, directions or
26 suggestions in handling, combating, or otherwise dealing with
27 any persons considered to be "Suppressive" or persons considered
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1 to be critics, enemies, or otherwise adverse to the Church of
2 Scientology and/or its practices. This is to include any such
3 documents that discuss actions that have taken place, or
4 specific directions to take place. Also includes "Fair Game."

5 Response to No. 69: Plaintiff objects to this
6 interrogatory as it exceeds the limit of 35 specified by
7 California Code of Civil Procedure section 2030(c)(1). There are
8 no circumstances which warrant a greater number under Code of
9 Civil Procedure section 2030(c)(2). Further, plaintiff objects
10 as the interrogatory is vague, ambiguous, unintelligible,
11 overbroad and burdensome. Plaintiff further objects on the
12 grounds that the subject matter of the interrogatory is
13 irrelevant and not calculated to lead to the discovery of
14 admissible evidence. Plaintiff further objects as the
15 interrogatory seeks to invade the rights of freedom of
16 association, religion and privacy under state and federal law.
17 Further, plaintiff is under no obligation to perform research
18 for defendant. Last, defendant's request is taken in bad faith,
19 frivolous and intended solely to harass plaintiff in violation
20 of California Code of Civil Procedure section 128.5.

21
22 Interrogatory No. 70: IDENTIFY any and all DOCUMENTS in
23 your possession, or known to YOU to exist that in any way
24 discuss, describe, mention or refer to transmitting information
25 to the media, or third persons, including but not limited to
26 lying, spreading rumors, black propaganda and "noisy"
27 investigations of individuals believed to be adverse to the
28 Church of Scientology and/or its practices.

1 Response to No. 70: Plaintiff objects to this
2 interrogatory as it exceeds the limit of 35 specified by
3 California Code of Civil Procedure section 2030(c)(1). There are
4 no circumstances which warrant a greater number under Code of
5 Civil Procedure section 2030(c)(2). Further, plaintiff objects
6 as the interrogatory is vague, ambiguous, unintelligible,
7 overbroad and burdensome. Plaintiff further objects on the
8 grounds that the subject matter of the interrogatory is
9 irrelevant and not calculated to lead to the discovery of
10 admissible evidence. Plaintiff further objects as the
11 interrogatory seeks to invade the rights of freedom of
12 association, religion and privacy under state and federal law.
13 Further, plaintiff is under no obligation to perform research
14 for defendant. Last, defendant's request is taken in bad faith,
15 frivolous and intended solely to harass plaintiff in violation
16 of California Code of Civil Procedure section 128.5.

17
18 Interrogatory No. 71: IDENTIFY any and all DOCUMENTS in
19 your possession, or known to YOU to exist that in any way
20 discuss, describe, mention or refer to payments by Religious
21 Technology Center, Author Services Inc. or any other Church of
22 Scientology related corporation or entity to L. Ron Hubbard.

23 Response to No. 71: Plaintiff objects to this
24 interrogatory as it exceeds the limit of 35 specified by
25 California Code of Civil Procedure section 2030(c)(1). There are
26 no circumstances which warrant a greater number under Code of
27 Civil Procedure section 2030(c)(2). Further, plaintiff objects
28

1 as the interrogatory is vague, ambiguous, unintelligible,
2 overbroad and burdensome. Plaintiff further objects on the
3 grounds that the subject matter of the interrogatory is
4 irrelevant and not calculated to lead to the discovery of
5 admissible evidence. Plaintiff further objects as the
6 interrogatory seeks to invade the rights of freedom of
7 association, religion and privacy under state and federal law.
8 Further, plaintiff is under no obligation to perform research
9 for defendant. Last, defendant's request is taken in bad faith,
10 frivolous and intended solely to harass plaintiff in violation
11 of California Code of Civil Procedure section 128.5.

12 Interrogatory No. 72: IDENTIFY any and all DOCUMENTS
13 located in the ARMSTRONG file that in any way discuss, describe,
14 mention or refer to L. Ron Hubbard's life and biography,
15 including but not limited to the history of his life, his
16 developments of Scientology, his military career, his education,
17 involvement with Black magic, his relationship with any of his
18 past wives other than Mary Sue Hubbard, his relationship with L.
19 Ron Hubbard Jr.

20 Response to No. 72: Plaintiff objects to this
21 interrogatory as it exceeds the limit of 35 specified by
22 California Code of Civil Procedure section 2030(c)(1). There are
23 no circumstances which warrant a greater number under Code of
24 Civil Procedure section 2030(c)(2). Further, plaintiff objects
25 as the interrogatory is vague, ambiguous, unintelligible,
26 overbroad and burdensome. Plaintiff further objects on the
27 grounds that the subject matter of the interrogatory is
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1 irrelevant and not calculated to lead to the discovery of
2 admissible evidence. Plaintiff further objects as the
3 interrogatory seeks to invade the rights of freedom of
4 association, religion and privacy under state and federal law.
5 Further, plaintiff is under no obligation to perform research
6 for defendant. Last, defendant's request is taken in bad faith,
7 frivolous and intended solely to harass plaintiff in violation
8 of California Code of Civil Procedure section 128.5. Without
9 waiving the foregoing objections, plaintiff has no knowledge of
10 or access to the court file in Church of Scientology of
11 California v. Armstrong, Los Angeles Superior Court No.
12 C420153 or documents related to the subject matter of that
13 litigation.

14 Further, defendant's request is interposed in bad faith, as
15 defendant has full and complete access to the "Armstrong file"
16 and indeed Corydon and his attorney submitting these
17 interrogatories have had exclusive access to said file by
18 order of the Armstrong court.

19 Interrogatory No. 73: IDENTIFY any and all DOCUMENTS
20 located in the ARMSTRONG file that in any way discuss, describe,
21 mention or refer to policies, directions or suggestions in
22 handling, combating, or otherwise dealing with any persons
23 considered to be "Suppressive" or persons considered to be
24 critics, enemies, or otherwise adverse to the Church of
25 Scientology and/or its practices. This is to include any such
26 documents that discuss actions that have taken place, or
27 specific direction to take place. Also includes "Fair Game."

28 Response to No. 73: Plaintiff objects to this

1 interrogatory as it exceeds the limit of 35 specified by
2 California Code of Civil Procedure section 2030(c)(1). There are
3 no circumstances which warrant a greater number under Code of
4 Civil Procedure section 2030(c)(2). Further, plaintiff objects
5 as the interrogatory is vague, ambiguous, unintelligible,
6 overbroad and burdensome. Plaintiff further objects on the
7 grounds that the subject matter of the interrogatory is
8 irrelevant and not calculated to lead to the discovery of
9 admissible evidence. Plaintiff further objects as the
10 interrogatory seeks to invade the rights of freedom of
11 association, religion and privacy under state and federal law.
12 Further, plaintiff is under no obligation to perform research
13 for defendant. Last, defendant's request is taken in bad faith,
14 frivolous and intended solely to harass plaintiff in violation
15 of California Code of Civil Procedure section 128.5. Without
16 waiving the foregoing objections, plaintiff has no knowledge of
17 or access to the court file in Church of Scientology of
18 California v. Armstrong, Los Angeles Superior Court No.
19 C420153 or documents related to the subject matter of that
20 litigation.

21 Further, defendant's request is interposed in bad faith, as
22 defendant has full and complete access to the "Armstrong file"
23 and indeed Corydon and his attorney submitting these
24 interrogatories have had exclusive access to said file by
25 order of the Armstrong court.

26 Interrogatory No. 74: IDENTIFY any and all DOCUMENTS
27 located in the ARMSTRONG file that in any way discuss, describe,
28

1 mention or refer to transmitting information to the media, as a
2 third person, including but not limited to lying, spreading
3 rumors, black propaganda and "noisy" investigations of
4 individuals believed to be adverse to the Church of Scientology
5 and/or its practices.

6 Response to No. 74: Plaintiff objects to this
7 interrogatory as it exceeds the limit of 35 specified by
8 California Code of Civil Procedure section 2030(c)(1). There are
9 no circumstances which warrant a greater number under Code of
10 Civil Procedure section 2030(c)(2). Further, plaintiff objects
11 as the interrogatory is vague, ambiguous, unintelligible,
12 overbroad and burdensome. Plaintiff further objects on the
13 grounds that the subject matter of the interrogatory is
14 irrelevant and not calculated to lead to the discovery of
15 admissible evidence. Plaintiff further objects as the
16 interrogatory seeks to invade the rights of freedom of
17 association, religion and privacy under state and federal law.
18 Further, plaintiff is under no obligation to perform research
19 for defendant. Last, defendant's request is taken in bad faith,
20 frivolous and intended solely to harass plaintiff in violation
21 of California Code of Civil Procedure section 128.5. Without
22 waiving the foregoing objections, plaintiff has no knowledge of
23 or access to the court file in Church of Scientology of
24 California v. Armstrong, Los Angeles Superior Court No.
25 C420153 or documents related to the subject matter of that
26 litigation.

27 Further, defendant's request is interposed in bad faith, as
28 defendant has full and complete access to the "Armstrong file"

1 and indeed Corydon and his attorney submitting these
2 interrogatories have had exclusive access to said file by
3 order of the Armstrong court.
4

5 Interrogatory No. 75: Payments by Religious Technology
6 Center, Author Services Inc. or any other Church of Scientology
7 related corporation or entity to L. Ron Hubbard.

8 Response to No. 75: Plaintiff objects to this
9 interrogatory as it exceeds the limit of 35 specified by
10 California Code of Civil Procedure section 2030(c)(1). There are
11 no circumstances which warrant a greater number under Code of
12 Civil Procedure section 2030(c)(2). Further, plaintiff objects
13 as the interrogatory is vague, ambiguous, unintelligible,
14 overbroad, burdensome and consists of a statement and not an
15 interrogatory. Last, defendant's request is taken in bad faith,
16 frivolous and intended solely to harass plaintiff in violation
17 of California Code of Civil Procedure section 128.5.

18 Interrogatory No. 76: IDENTIFY any and all DOCUMENTS
19 located in the ARMSTRONG file that in any way discuss, describe,
20 mention or refer to payments by Religious Technology Center,
21 Author Services Inc. or any other Church of Scientology related
22 corporation or entity to L. Ron Hubbard.

23 Response to No. 76: Plaintiff objects to this
24 interrogatory as it exceeds the limit of 35 specified by
25 California Code of Civil Procedure section 2030(c)(1). There are
26 no circumstances which warrant a greater number under Code of
27 Civil Procedure section 2030(c)(2). Further, plaintiff objects
28

1 as the interrogatory is vague, ambiguous, unintelligible,
2 overbroad and burdensome. Plaintiff further objects on the
3 grounds that the subject matter of the interrogatory is
4 irrelevant and not calculated to lead to the discovery of
5 admissible evidence. Plaintiff further objects as the
6 interrogatory seeks to invade the rights of freedom of
7 association, religion and privacy under state and federal law.
8 Further, plaintiff is under no obligation to perform research
9 for defendant. Last, defendant's request is taken in bad faith,
10 frivolous and intended solely to harass plaintiff in violation
11 of California Code of Civil Procedure section 128.5. Without
12 waiving the foregoing objections, plaintiff has no knowledge of
13 or access to the court file in Church of Scientology of
14 California v. Armstrong, Los Angeles Superior Court No.
15 C420153 or documents related to the subject matter of that
16 litigation.

17 Further, defendant's request is interposed in bad faith, as
18 defendant has full and complete access to the "Armstrong file"
19 and indeed Corydon and his attorney submitting these
20 interrogatories have had exclusive access to said file by
21 order of the Armstrong court.

22 Interrogatory No. 77: As to the "Exhibits to Declaration
23 of Bent Corydon re Scientology Documents seized by the FBI read
24 by Mr. Corydon prior to Subject Broadcast" filed in support of
25 Mr. Corydon's summary judgment motion in Judicial Council
26 Coordination Proceeding no. 2151, IDENTIFY, by stamped number
27 at the bottom of each page each such DOCUMENT you contend is not
28 a true and accurate copy of a DOCUMENT seized by agents of the

1 FBI, or other government agents, from Church of Scientology
2 facilities.

3 Response to No. 77: Plaintiff objects to this
4 interrogatory as it exceeds the limit of 35 specified by
5 California Code of Civil Procedure section 2030(c)(1). There are
6 no circumstances which warrant a greater number under Code of
7 Civil Procedure section 2030(c)(2). Further, plaintiff objects
8 as the interrogatory is vague, ambiguous, unintelligible,
9 overbroad and burdensome. Plaintiff further objects on the
10 grounds that the subject matter of the interrogatory is
11 irrelevant and not calculated to lead to the discovery of
12 admissible evidence. Last, defendant's request is taken in bad
13 faith, frivolous and intended solely to harass plaintiff in
14 violation of California Code of Civil Procedure section 128.5.
15 Without waiving the foregoing objections, plaintiff responds
16 that he is unable to confirm or not to confirm what was
17 allegedly obtained or not obtained by government representatives
18 from "Church of Scientology facilities."

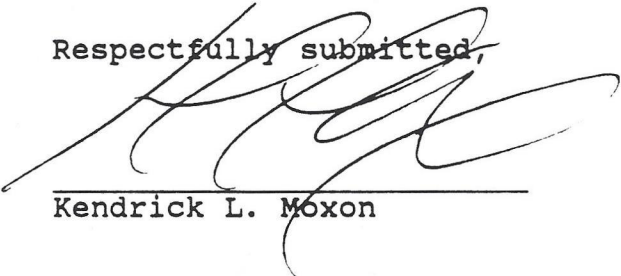
19
20 Interrogatory No. 78: As to the "Exhibits to Declaration
21 of Bent Corydon re Scientology Documents seized by the FBI read
22 by Mr. Corydon prior to Subject Broadcast" filed in support of
23 Mr. Corydon's summary judgment motion in Judicial Council
24 Coordination Proceeding number 2151, IDENTIFY, by stamped number
25 at the bottom of each page, each DOCUMENT you contend is not a
26 true and accurate copy of Scientology authored DOCUMENT, and by
27 the listed author, should an author be so indicated.

28 Response to No. 78: Plaintiff objects to this

1 interrogatory as it exceeds the limit of 35 specified by
2 California Code of Civil Procedure section 2030(c)(1). There are
3 no circumstances which warrant a greater number under Code of
4 Civil Procedure section 2030(c)(2). Further, plaintiff objects
5 as the interrogatory is vague, ambiguous, unintelligible,
6 overbroad and burdensome. Plaintiff further objects on the
7 grounds that the subject matter of the interrogatory is
8 irrelevant and not calculated to lead to the discovery of
9 admissible evidence. Last, defendant's request is taken in bad
10 faith, frivolous and intended solely to harass plaintiff in
11 violation of California Code of Civil Procedure section 128.5.
12 Without waiving said objections, plaintiff responds that he is
13 not qualified to and lacks knowledge enabling him to respond to
14 the interrogatory.

15 Dated: January 10, 1989

Respectfully submitted,


Kendrick L. Moxon

Attorney for
Plaintiff
John Carmichael

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing RESPONSES OF REVEREND JOHN CARMICHAEL TO DEFENDANT'S INTERROGATORIES (FOURTH SET).

I am a party to this action, and am authorized to make this verification, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on January 10, 1989 at Los Angeles,
California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



JOHN CARMICHAEL

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Hollywood, CA, 90028.

On January 10, 1989 I served the foregoing document described as RESPONSES OF REVEREND JOHN CARMICHAEL TO DEFENDANT'S INTERROGATORIES (FOURTH SET) on interested parties in this action by delivering a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Hollywood, California, addressed as follows:

PAUL MORANTZ
ATTORNEY AT LAW
P.O. Box 511
Pacific Palisades, CA 90272

Executed on January 10, 1989 at Hollywood, California.

